

REMARKS

Claims 2-7 and 11-19 are pending.

Applicant thanks the Examiner for noting the inadvertent error in connection with the priority application identified in the inventor's Declaration. Applicant's attorney is in the process of obtaining a corrected Declaration signed by the inventor. The corrected Declaration will be sent to the Patent Office as soon as it becomes available.

The specification has been amended to add headings and correct several minor errors as required by the Examiner.

A new abstract has been provided as required by the Examiner. A separate page with the new abstract is attached as part of this reply.

Claims 1-7 and 14-18 were rejected as indefinite under 35 U.S.C. 112, par. 2. Claim 1 has been cancelled and replaced by new claim 19. Applicant submits that claim 19 satisfies the requirements of section 112, par. 2 and respectfully requests withdrawal of the rejections of the claims as indefinite.

Applicant thanks the Examiner for indicating that claim 11 includes allowable subject matter. That claim has been re-written in independent form to include the limitations of claim 8 from which it depended. Therefore, claim 11 should be allowable.

Claim 13 has been amended to depend from claim 11 and should, therefore, be allowable as well.

The other claims were rejected over the prior art as follows:

* Claims 1, 7 and 18 were rejected as anticipated by U.S. Patent No. 5,499,944 (Weston et al.).

* Claims 2 and 3 were rejected as unpatentable over the Weston et al. patent in view of British publication 2187021.

* Claims 4-6, 12 and 17 were rejected as unpatentable over the Weston et al. patent in view of U.S. Patent No. 4,512,453 (Schuller et al.).

* Claims 8 and 14-15 were rejected as unpatentable over the Weston et al. patent in view of U.S. Patent No. 1,765,014 (Hochreim).

As discussed below, applicant respectfully disagrees.

The Weston et al. patent discloses a coin handling apparatus that includes a microprocessor. The microprocessor is coupled to input/output circuitry 62 that helps operate the apparatus. The circuitry 62 includes switches intended to be operated by service personnel. The switches can be used by the service personnel to switch the apparatus between a float up mode and a float down mode.

The Weston et al. patent does not expressly indicate the location of the switches. Nevertheless, it is clear that, as part of the circuitry 62 (which, as explained at col. 4, line 14, includes sensors for the coin containers, circuits for operating the dispenser, gates of the coin separator, circuitry for the coin validator, etc), one of ordinary skill in the art would have understood that the switches are located inside the apparatus such that they could not be operated by a person unless that person accessed internal components of the machine. Indeed, operation of the apparatus disclosed in the Weston et al. patent, which is assigned to the assignee of the pending application, is similar to the "conventional" way of operating cash handling machines as described at page 5, lines 12-18 of the specification.

In contrast, independent claim 19 recites that the machine includes means for switching between the normal mode and the float mode in response to an operation by a person, "wherein the operation can be performed by the person without having to access internal components of the machine." That is simply not disclosed by the Weston et al. patent. Nor would it have been

an inherent feature of the Weston et al. apparatus. Therefore, there is no anticipation of claim 19.

Nor would it have been obvious to provide such a feature in the apparatus of the Weston et al. patent. The Weston et al. patent discusses the performance of various operations by service personnel. In addition to the use of the switches in the circuitry 62 to switch between the various float modes, the service personnel can empty coins from the cashbox, an activity which clearly assumes the ability to access internal areas of the apparatus. In contrast, the subject matter of claim 19 can allow an on-site manager or other non-service personnel, for example, to switch the mode of the machine without compromising the security of the machine and without interfering with its normal operation (*see* page 2, line 13 – page 3, line 7). Although service personnel also can switch the mode of the machine, the claimed invention may facilitate performance of some of the operations previously performed by service personnel to be performed by other individuals. That advantage would not have been available by use of the switches disclosed in the Weston et al. patent. Therefore, claim 19 would not have been obvious. A contrary conclusion would be precisely the type of hindsight prohibited by the Court of Appeals for Federal Circuit.

Nor does the British publication, the Hochreim patent or the Schuller et al. patent—alone or in combination with the Weston et al. patent—disclose or suggest the subject matter of claim 19. To the contrary, the keyboard console 25 disclosed in the Schuller et al. patent is part of the “internal detail” of the vendor 11, as indicated by FIG. 1 and the accompanying brief description of that drawing at col. 5, lines 58-61. There is simply no suggestion of a means for switching between the normal mode and the float mode in response to an operation by a person, “wherein the operation can be performed by the person without having to access internal components of the machine.”

In view of the foregoing remarks, applicant respectfully requests allowance of claim 19, as well as dependent claims 2-7 and 14-18.

Claim 12 has been re-written in independent form and recites a cash handling machine that includes a first cash store operable to dispense cash to a user and replenishable by cash received from a user and a further store. In one particular implementation, the first cash store may include a coin change tube, and the further store may include a cashbox. The machine is responsive to an instruction for discharging cash from the first store to the further store until one or more predetermined conditions are met and includes means for receiving an instruction issued remotely from the machine for performing said discharging operation. Thus, the instruction may be issued from a location at some distance from the machine. For example, in one particular implementation, the machine may include a modem so that the instruction to be received by the machine is issued remotely via a telephone call.

The Office action points to the Schuller et al. patent's disclosure of data ports 31, 33 and states that they are "for receiving instructions from remote sources." That is incorrect. Instead, the Schuller et al. patent states that:

At the bottom of console display and keyboard 25 are two data ports 31 and 33 over which data from the cash accountability system can be supplied to infrared or magnetic probes for collection and subsequent analysis.

(Col. 8, lines 29-33) The cash accountability system is part of the vendor 11 (*see* FIG. 1 and the description of that FIG. at col. 5, lines 57-61). Thus, there is no disclosure in the Schuller et al. patent of the vendor 11 receiving any kind of instruction issued remotely.

Furthermore, even if there were some suggestion—which there is not—of using the data ports 31, 33 to receive a remote instruction, there is no suggestion of using the ports to receive a remotely-issued "float" instruction. That is because the float operations associated with such instructions conventionally were performed on-site by service personnel.

For at least those reasons, claim 12 should be allowable as well.

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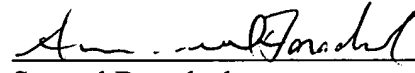
Conclusion

Applicant respectfully requests allowance of all pending claims.

Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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